



Order Filed on January 22, 2025  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

SB-1848-C

Eisenberg Gold & Agrawal, P.C.

William E. Craig, Esquire

1040 Kings Highway North #200

Cherry Hill, NJ 08034

Attorney for Santander Consumer USA Inc.

Case No. 22-19222

Adv. No.

Hearing Date: 1-7-25

Judge: (ABA)

In Re:

LAMAR A. FREEMAN

LORETTA FREEMAN

**ORDER FOR ARREARAGE CURE, MONTHLY PAYMENTS, STAY RELIEF UNDER CERTAIN  
CIRCUMSTANCES, COUNSEL FEES, AND INSURANCE**

The relief set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**.

**DATED: January 22, 2025**

A handwritten signature in black ink, appearing to read "ABJ", is written over a horizontal line.

Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

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Debtors: Lamar and Loretta Freeman

Case No: 22-19222

Caption of Order: Order for arrearage cure, monthly payments, stay relief under certain circumstances, counsel fees, and insurance.

This matter having brought before this Court on a Motion For Stay Relief filed by William E. Craig, Esq., attorney for Santander Consumer USA Inc. ("Santander"), with the appearance of Stacey L. Mullen, Esq. on behalf of the Debtors, and this Order having been filed with the Court and served upon the Debtors and their attorney under the seven day rule with no objections having been received as to the form or entry of the Order and for good cause shown, it is hereby

**ORDERED:**

- 1. That Santander is the holder of a first purchase money security interest encumbering a 2013 Cadillac CTS bearing vehicle identification number 1G6DE5E53D0110375.**
- 2. That the Debtors' account has post-petition arrears through December 2024 in the amount of \$2,136.43.**
- 3. That the Debtors are to cure the arrears set forth in paragraph two (2) above by making their regular monthly payment of \$415.81 plus an additional \$356.07 (for a total monthly payment of \$771.88) for the months of January through June 2025.**
- 4. That commencing January 2025, if the Debtors fail to make any payment to Santander within thirty (30) days after it falls due, Santander shall be entitled to stay relief upon filing a certification with the Court and serving it on the Debtors, their attorney, and the Chapter 13 Trustee.**
- 5. That the Debtors must maintain insurance on the vehicle. The vehicle must have full comprehensive and collision coverage with deductibles not exceeding \$500.00 each. Santander Consumer USA must be listed as loss payee. If the Debtors fail**

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- to maintain valid insurance on the vehicle, Santander shall be entitled to stay relief upon filing a certification that insurance has lapsed and serving such certification on the Debtors, their attorney, and the Chapter 13 Trustee.**
- 6. That the Debtors are to pay a counsel fee of \$449.00 to Santander Consumer USA Inc. through their Chapter 13 Plan.**